

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

IN RE: SANTA FE NATURAL TOBACCO
COMPANY MARKETING & SALES
PRACTICES AND PRODUCTS LIABILITY
LITIGATION

Lead Case No. MD 16-2695 JB/LF

This Document Relates To All Cases

JOINT MOTION TO EXTEND CERTAIN DEADLINES

Plaintiffs and Defendants jointly move for a short extension of certain expert disclosure deadlines set in the governing scheduling order [Doc. 242] that will not result in altering the current deadlines for completing expert discovery or the class certification briefing schedule.

The specific extensions requested and agreed upon are as follows:

1. The August 16, 2019 deadline for Defendants' expert witness disclosures for Jan Steenkamp and Kip Viscusi will be extended by two weeks to August 30, 2019 and the disclosure deadline for Kent Van Liere will be extended by three weeks to September 6, 2019.
2. The August 30, 2019 deadline for Plaintiffs' expert rebuttal disclosures, if any, will be extended by three weeks to September 20, 2019.

WHEREFORE, the parties jointly move the Court to adopt these proposed amended deadlines, which are set forth below. All other deadlines in the Court's March 23, 2019 Scheduling Order [Doc. 242] remain as set and are re-stated below:

Disclosure of Defendants' Fed. R. Civ. P. 26(a)(2) expert witness disclosures (class experts), including written reports, for Charles Garner and David Teece	August 16, 2019
Disclosure of Defendants' Fed. R. Civ. P. 26(a)(2) expert witness disclosures (class experts), including written reports, for Jan	August 30, 2019

Steenkamp and Kip Viscusi	
Disclosure of Defendants' Fed. R. Civ. P. 26(a)(2) expert witness disclosures (class experts), including written reports, for Kent Van Liere	September 6, 2019
Disclosure of Plaintiffs' rebuttal expert disclosures (class experts) pursuant to Fed. R. Civ. P. 26(a)(2), including written reports and available dates for depositions of each disclosed expert.	September 20, 2019
All expert depositions to be completed.	October 31, 2019
Deadline to file the motion in support of class certification and all <i>Daubert</i> motions.	December 2, 2019
Defendants shall file their opposition to Plaintiffs' motion for class certification and all parties shall file oppositions to <i>Daubert</i> motions.	January 31, 2020
Plaintiffs shall file their reply in support of their motion for class certification, and all parties shall file replies to <i>Daubert</i> motions.	February 21, 2020
Hearing on motion for class certification and <i>Daubert</i> motions	Week of April 17, 2020
120 Days After Ruling on Class Certification	Completion of discovery. Within 7 days after the Court's ruling on the motion for class certification, the parties will meet and confer regarding the completion of discovery including, but not limited to, additional depositions, experts, and other discovery.
60 Days After the Completion of Discovery	Deadline for Fed. R. Civ. P. 56 motions for summary judgment
120 Days After the Completion of Discovery	Deadline for briefs in opposition to Fed. R. Civ. P. 56 motions for summary judgment
150 Days After the Completion of Discovery	Deadline for reply briefs in support of Fed. R. Civ. P. 546 motions for summary judgment.

A proposed order will be submitted in accordance with the Court's instructions.

Dated: August 12, 2019

/s/ Scott P. Schlesinger
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 12, 2019, the foregoing *Joint Motion and [Proposed] Order Extending Deadlines* was electronically filed with the Clerk of Court using the CM/ECF system that will send notification of such filing to all counsel of record:

By: /s/ Michael F. Stoer
Attorney for Defendants